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JAN 27 1994

BEFORE THE  
**Federal Communications Commission**

WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In Re Request of

ARCH COMMUNICATIONS GROUP

For a Temporary Waiver of  
Section 90.495 (a)(5) of the  
Commission's Rules Pending a  
Conversion From Multi-Frequency  
to Dedicated Transmitters

PR 93-35

To: The Chief, Private Radio Bureau

**Request For Waiver**

1. Arch Communications, Inc. ("Arch"), on its own behalf and on behalf of its affiliated licensee companies,<sup>1/</sup> by its attorneys and pursuant to Section 90.151 of the Commission's rules, hereby respectfully requests a temporary waiver of Section 90.495(a)(5) of the Commission's rules. Specifically, Arch seeks a two-year period to convert its nationwide and regional private carrier paging ("PCP") systems from the use of multi-frequency transmitters to the use of dedicated transmitters while retaining exclusivity for its systems under the Amendment of the Commission's Rules to Provide Channel Exclusivity to Qualified

<sup>1/</sup> The affiliates of Arch include Arch Capitol District, Inc., Arch Southeast Communications, Inc., Arch Michigan, Inc. and Arch Connecticut Valley, Inc., each of which have filed for private carrier paging licenses.

Private Paging Systems at 929-930 MHz.<sup>2/</sup> In support of this request, the following is respectfully shown:

### I. Background

2. Arch, through its affiliated companies, provides common carrier paging, PCP, common carrier mobile and Specialized Mobile Radio services to the public. Arch is a publicly-held company and enjoys a status as one of the fastest growing providers of mobile radio services in the country.<sup>3/</sup> The range of the Arch operations includes local systems, regional systems, and more recently, nationwide systems.<sup>4/</sup> In pursuing its business activities, Arch has been an active participant in Commission proceedings involving licensing issues, including the PCP exclusivity proceeding.<sup>5/</sup>

3. The Exclusivity Order enables PCP operators to earn the right to the exclusive use of certain PCP channels based upon a showing that the carrier has placed specified minimum numbers of transmitters in service on a particular frequency throughout the service territory for which exclusivity is sought.

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<sup>2/</sup> Report and Order, FCC 93-479, released November 17, 1993 (the "Exclusivity Order").

<sup>3/</sup> Arch currently serves approximately 280,000 paging units.

<sup>4/</sup> Arch has responded to the growing number of its customers desiring wide-area and nationwide service by developing a national paging system utilizing private carrier channels.

<sup>5/</sup> See Comments of Arch Communications Group, Inc. in PR Docket No. 93-35.

The exclusivity rules permit incumbent carriers to qualify for exclusivity based on licenses granted or applications filed prior to October 14, 1993.<sup>6/</sup> As specified in the Commission's recent Public Notice,<sup>7/</sup> incumbents who request exclusivity based on grandfathered licenses or applications are accorded eight months following issuance of a public notice conditionally designating the incumbent's system as exclusive to demonstrate that they have constructed a qualifying system (the "Compliance Deadline").<sup>8/</sup> In addition, the governing rules provide, inter alia, that:

Frequency-agile transmitters may be counted no more than once for the purposes of this section. A licensee using frequency-agile transmitters may qualify for exclusivity on a second frequency by constructing twice the number of transmitters required to obtain exclusivity on a single frequency, provided all other requirements of this section are met.<sup>9/</sup>

4. Based upon authorized PCP stations and applications pending before the FCC on or before October 14, 1993, Arch is able to request exclusivity with respect to one nationwide system,<sup>10/</sup> and discrete regional systems in a

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<sup>6/</sup> Exclusivity Order, Section 3F.

<sup>7/</sup> DA 94-35, released January 10, 1994.

<sup>8/</sup> This eight-month deadline does not serve to extend the construction period authorized under any individual license.

<sup>9/</sup> 47 C.F.R. Section 90.495(a)(5).

<sup>10/</sup> Arch's nationwide system is on the frequency 929.8375 MHz. As is indicated by Exhibit 1 hereto, the authorizations for this system that meet the cut-off date for grandfathered status include 502 sites in 72 of the top 100 markets and 40 of the top 50 markets. The qualifying sites include a

southeastern region,<sup>11/</sup> a western region,<sup>12/</sup> a northeastern region,<sup>13/</sup> and a central region.<sup>14/</sup> Arch is in the process of constructing these systems and will have a sufficient number of transmitters in service by the Compliance Deadline to qualify for

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minimum of 4 markets within each of the 7 Regional Bell Operating Company regions.

<sup>11/</sup> Arch's Southeastern Region has been defined to include Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Virginia and West Virginia. This system is on the frequency 929.3625 MHz. As indicated by Exhibit 2, this system includes 266 sites as of the cut-off date for grandfathered status. This defined region includes 4 of the top 30 markets (Miami, Atlanta, Tampa and New Orleans) and a minimum of 6 sites are specified for each of these major markets.

<sup>12/</sup> Arch's Western Region consists of Arkansas, Arizona, California, Colorado, Kansas, New Mexico, Nevada, Oklahoma, Texas and Utah. This system is on the frequency 929.3625 MHz. As indicated by Exhibit 3, this system includes 143 sites that meet the cut-off date for grandfathered status. These include sites within 7 of the top 30 markets including Los Angeles, San Francisco, Dallas, San Diego, Denver and Phoenix, with a minimum number of transmitters in each to qualify for local exclusivity.

<sup>13/</sup> Arch's Northeastern Region consists of Connecticut, District of Columbia, Massachusetts, Maryland, Maine, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Virginia and Vermont. This system operates on 929.8875 MHz. As indicated on Exhibit 4 hereto, this regional system includes 109 sites that meet the cut-off date for grandfathered status. This system includes sites within 6 of the top 30 markets including New York, Philadelphia, Boston, Pittsburgh, Baltimore and Buffalo, each with a sufficient number of sites to qualify for local exclusivity.

<sup>14/</sup> Arch's Central Region consists of Iowa, Illinois, Indiana, Michigan, Minnesota, Ohio, South Dakota and Wisconsin. This system operates on the frequency 929.8875 MHz. As indicated on Exhibit 5, this regional system includes 101 sites within 7 of the top 30 markets (Chicago, Detroit, Minneapolis, Cleveland, Milwaukee, Cincinnati and Indianapolis), each with a sufficient number of transmitters to qualify for local exclusivity.

exclusivity were it entitled to count multi-frequency transmitters toward the requirements. Moreover, Arch has implemented an aggressive program that will enable it to convert a sufficient number of sites from the use of multi-frequency transmitters to dedicated transmitters within a 2-year period to meet the requirements of the new rules. This request seeks a temporary waiver of Section 90.425(a)(5) of the Commission's rules in order to permit Arch to maintain exclusivity during this transition period.

## **II. Description of the Requested Waiver**

5. In order to qualify for exclusivity for its nationwide system and four discrete regional systems, Arch will be required to install 584 dedicated transmitters.<sup>15/</sup> At present, the company has installed 117 dedicated transmitters, and expects to have 183 additional transmitters in service as of the Compliance Deadline.<sup>16/</sup> Arch requests an additional 2-year period in which to install the remainder of its dedicated transmitters (284), which means that it will be installing, on

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<sup>15/</sup> The nationwide system requires a minimum of 300 transmitters. The regional systems each require 70 transmitters (280 total). Arch has determined, based upon its deployment plan, that a few additional transmitters will be necessary to meet all of the geographic dispersion requirements. Consequently, the total build-out will include 584 dedicated transmitters.

<sup>16/</sup> Based upon discussions with the Commission and NABER, Arch anticipates that this construction deadline will fall during the fourth quarter of 1994.

average, between 35 and 36 transmitters per quarter throughout the waiver period.

### III. Good Cause for a Waiver is Shown

6. The primary purpose of the construction requirements governing PCP exclusivity requests is to assure that frequencies are dedicated to public service and not "warehoused". Arch's active construction program demonstrates that the company is, indeed, devoted to serving the public over the frequencies that are the subject of its exclusivity requests.

7. Substantial progress towards the implementation of the Arch systems has already been made. To date, 117 dedicated transmitters have been placed in service, at a cost to Arch of \$5.2 million,<sup>17/</sup> and Arch already is serving approximately 38,000 units on its PCP channels pursuant to its phased implementation program. Furthermore, Arch is committed to initiating service to the public on its nationwide system and its discrete regional systems from a sufficient number of geographically dispersed sites by the Compliance Deadline to qualify for exclusivity, albeit utilizing multi-frequency transmitters and through cooperative arrangements with co-carriers.<sup>18/</sup> In view of this system development, the Commission

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<sup>17/</sup> This includes design, development, application, construction and operating costs.

<sup>18/</sup> These co-carrier arrangements will enable Arch to initiate service promptly by placing its frequency in existing transmitters operated by others.

may rest assured that beneficial services will be available to the public and the frequencies will not be laying fallow. Thus, a major objective of the exclusivity requirements will be met immediately by Arch.

8. Good cause also is shown by the extent of Arch's investment in its PCP systems. As earlier indicated, Arch estimates that it has already expended \$5.2 million in the process of licensing, constructing and operating portions of the PCP systems for which exclusivity is sought. Budget estimates indicate that this investment will increase severalfold as the systems are fully implemented on a multi-frequency transmitter basis throughout the requested service territories by the Compliance Deadline. A major purpose of the Commission's construction requirements was to assure that carriers had a sufficient investment in their system infrastructure to guarantee a seriousness of purpose. Here, that objective is satisfied.

9. The transition to a system utilizing dedicated transmitters will require a period of time extending beyond the initial exclusivity Compliance Deadline. There are three limiting factors which adversely affect the ability of Arch to make the transition to dedicated transmitters at an earlier date. First, Arch must take delivery on the necessary equipment. Arch has been in contact with its equipment supplier, Glenayre, and has been advised that the company cannot meet Arch's transmitter requirements within the normal deadline contemplated by the

Commission's Exclusivity Order.<sup>19/</sup> Obviously, it would be unfair for Arch to lose its ability to secure exclusivity on its operating systems due to the inability of its equipment manufacturer to meet the delivery timetables.

10. The second limitation is on construction personnel. Typically, Arch handles the construction of its paging facilities utilizing a combination of in-house technical personnel and outside contractors. The internal Arch technical staff available for construction projects is relatively small, and the number of qualified, experienced outside consultants also is limited. Moreover, some of the construction contemplated by Arch at this time is in areas of the country in which Arch has not previously operated, which complicates to some extent the process of identifying competent construction personnel. The net result is that the scarcity of high-calibre personnel resources to complete a construction project of this magnitude turns out to be a limiting factor.

11. Thirdly, weather and other natural phenomena play a role. As the Commission is aware, large portions of the country have been experiencing record cold temperatures accompanied by considerable snow and ice. These weather conditions have interfered with Arch's construction program, and do not appear likely to abate soon. Additionally, the ongoing

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<sup>19/</sup> Arch has been advised by Glenayre that the company can deliver 20 transmitters per month to Arch commencing in May of 1994. This delivery schedule would not enable Arch to meet the Compliance Deadline on a dedicated transmitter basis.



construction project was affected by the midwestern floods this summer and could be further set back by the recent California earthquakes. Unpredictable incidents of this nature can have a domino effect on construction timetables when an implementation program as broad as Arch's PCP construction is involved.

12. Granting the requested waiver will have the incidental benefit of fostering increased competition in the nationwide and wide-area paging markets. As the Commission is aware, the cost of local paging services has declined steadily over the years as the availability of additional paging frequencies has enabled new carriers to enter the market, thereby increasing price competition. Competition in nationwide and multi-state regional services has been slower to develop because of greater scarcity of paging channels available for licensing to a carrier on an exclusive basis throughout regions of this size. The adoption of the Exclusivity Order increases the attractiveness of using PCP frequencies for wide-area services of this nature. Granting Arch the requested waiver will enable the company to continue to develop as a strong competitor to other more entrenched companies.

#### **IV. The Legal Standard for a Waiver is Met**

13. Commission precedent establishes that a waiver is appropriate if the applicant can show special circumstances that

warrant deviation from the general rule.<sup>20/</sup> In this instance, the foregoing showing meets the applicable standard. Arch is shown to be a serious paging operator with over 117 dedicated PCP base station transmitters in service on its PCP frequencies. It has invested \$5.2 million to date, and is scheduled under its business plan to invest substantial additional funds in the near future. Based upon the scope of its existing and proposed system, Arch qualifies as one of a select number of paging companies able to compete effectively in the wide-area and nationwide paging arena. Thus, its transition plan, which will enable it to retain exclusive use of its dedicated frequencies, will serve the public interest.<sup>21/</sup>

## V. Conclusion

14. The foregoing premises having been duly considered, Arch respectfully requests a temporary waiver of Section 90.425(a)(5) for a 2 year period as requested herein.

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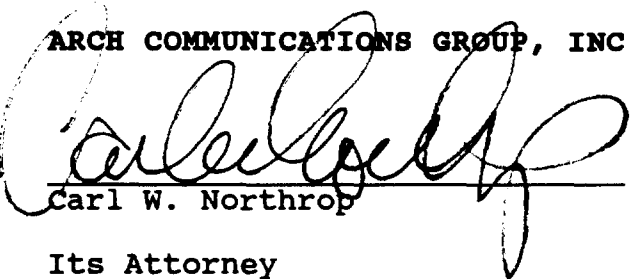
<sup>20/</sup> See Wait Radio v. FCC, 418 F. 2d 1153 (D. C. Cir. 1969).

<sup>21/</sup> Arch notes that several parties have sought reconsideration of the Exclusivity Order in part to request slow-growth options or transitional implementation periods for incumbent PCP licensees. If, for any reason, the Commission does not consider Arch's situation to be sufficiently unique to justify the relief which is sought, Arch urges the Commission to change the rules to provide a 2 year transition period to all carriers for the conversion of qualifying systems from the use of multi-frequency transmitter to the use of dedicated transmitters while retaining exclusivity. Comments to this end are being prepared and will be filed in support of the reconsideration requests.

Respectfully submitted,

ARCH COMMUNICATIONS GROUP, INC.

By:

  
Carl W. Northrop

Its Attorney

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January 27, 1994

## **Exhibit 1**

Attached hereto as Attachments A and B are excerpts from Arch's Exclusivity Request for the nationwide system that demonstrate the scope of Arch's grandfathered facilities and compliance with the applicable exclusivity requirements in this region.

## ATTACHMENT A

**Arch Communications Group, Inc.  
929.8375 MHz Nationwide Exclusivity Request**

<u>Criteria</u>	<u>Requirement</u>	<u>Qualifying Grandfathered Sites</u>
Number of Sites	300	502
Top 100 Markets	50	72
Top 50 Markets	25	40
Major Markets within RBOC Regions:		
Region 1	2	10
Region 2	2	4
Region 3	2	10
Region 4	2	20
Region 5	2	6
Region 6	2	13
Region 7	2	9

Attachment B  
Arch Communications Group, Inc.  
Authorized and Pending Sites Listed by State  
on Frequency 929.8375 as of October 14, 1993

State: AK

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCQ896	ANCHORAGE	AK	No		ASE
WPCQ895	ANGOON	AK	No		ASE
WPCQ895	GUSTAVUS	AK	No		ASE
WPCQ895	HAINES	AK	No		ASE
WPCQ896	HEALY	AK	No		ASE
WPCQ896	HONOLULU	AK	No		ASE
WPCQ895	HOONAH	AK	No		ASE
WPCQ895	JUNEAU	AK	No		ASE
WPCQ896	NENANA HILL	AK	No		ASE
WPCQ895	PELICAN CITY	AK	No		ASE
WPCQ896	TALKEETNA	AK	No		ASE
WPCQ896	WASILLA	AK	No		ASE

Number of sites in state: 12

State: AL

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCZ733	BIRMINGHAM	AL	No		ASE
WPCZ733	BIRMINGHAM	AL	No		ASE
WPCZ733	BIRMINGHAM	AL	No		ASE
WPCZ733	BLOUT SPRINGS	AL	No		ASE
WPBS480	MOBILE	AL	No		ASE
WPCZ733	REMLAP	AL	No		ASE
WPBS480	ROBERTSDALE	AL	No		ASE
WPCZ733	SUMITON	AL	No		ASE
WPBS480	THEODORE	AL	No		ASE
WPBS480	WEEKS BAY	AL	No		ASE

Number of sites in state: 10

Attachment B  
Arch Communications Group, Inc.  
Authorized and Pending Sites Listed by State  
on Frequency 929.8375 as of October 14, 1993

State: AR

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCQ217	ARKADELPHIA	AR	No		ASE
WPCQ217	CLINTON	AR	No		ASE
WPCQ217	HARRISBURG	AR	No		ASE
WPCQ217	LITTLE ROCK	AR	No		ASE
WPCQ217	MOUNT NEBO	AR	No		ASE
WPCQ217	SEARCY	AR	No		ASE
WPDD850	WEST MEMPHIS	AR	No		ASE

Number of sites in state: 7

State: AZ

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPBW334	CHANDLER	AZ	No		ASE
WPCE300	COOLIDGE	AZ	No		ASE
WPCE300	COTTONWOOD	AZ	No		ASE
WPCE300	FLAGSTAFF	AZ	No		ASE
WPBW334	GLENDALE	AZ	No		ASE
WPBW334	PHOENIX	AZ	No		ASE
WPBW334	PHOENIX	AZ	No		ASE
WPBW334	PHOENIX	AZ	No		ASE
WPBW334	SCOTTSDALE	AZ	No		ASE
WPCE300	TUCSON	AZ	No		ASE
WPCE300	WILLCOX	AZ	No		ASE
WPCE300	WITTMAN	AZ	No		ASE

Number of sites in state: 12

State: CA

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCE301	BAKERSFIELD	CA	No		ASE
WPCB992	BEAUMONT	CA	No		ASE

Attachment B  
Arch Communications Group, Inc.  
Authorized and Pending Sites Listed by State  
on Frequency 929.8375 as of October 14, 1993

State: CA

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPBY844	BELMONT	CA	No		ASE
WPBY844	BURLINGAME	CA	No		ASE
WPBW335	CENTURY CITY	CA	No		ASE
WPBW335	CHATSWORTH	CA	No		ASE
WPCB993	CORONA	CA	No		ASE
WPCB993	COSTA MESA	CA	No		ASE
WPCB992	CRESTLINE	CA	No		ASE
WPCC266	ELK GROVE	CA	No		ASE
WPCC266	FOLSOM	CA	No		ASE
WPCE301	FRESNO	CA	No		ASE
WPCC234	FULLERTON	CA	No		ASE
WPBW335	GLENDALE	CA	No		ASE
WPCC234	INDUSTRY	CA	No		ASE
WPCE301	LA CIMA	CA	No		ASE
WPCB992	LOMA LINDA	CA	No		ASE
WPCC234	LOS ANGELES	CA	No		ASE
WPCC234	LOS ANGELES	CA	No		ASE
WPBW335	LOS ANGELES	CA	No		ASE
WPBW335	LOS ANGELES	CA	No		ASE
WPCE301	MERCED	CA	No		ASE
WPBY844	MOUNT TAMALPAIS	CA	No		ASE
WPBY844	NOVATO	CA	No		ASE
WPCB993	ORANGE	CA	No		ASE
WPBW335	PASADENA	CA	No		ASE
WPCC266	RIO LINDA	CA	No		ASE
WPCB992	RIVERSIDE	CA	No		ASE
WPCC234	ROLLING HILLS	CA	No		ASE
WPCB992	RUNNING SPRINGS	CA	No		ASE
WPCC266	SACRAMENTO	CA	No		ASE
WPCB992	SAN BERNARDINO	CA	No		ASE
WPCB993	SAN CLEMENTE	CA	No		ASE
WPCJ893	SAN DIEGO	CA	No		ASE
WPCJ893	SAN DIEGO	CA	No		ASE
WPCJ893	SAN DIEGO	CA	No		ASE
WPCJ893	SAN DIEGO	CA	No		ASE
WPCJ893	SAN DIEGO	CA	No		ASE
WPCB993	SAN DIMAS	CA	No		ASE
WPBY844	SAN FRANCISCO	CA	No		ASE
WPBY844	SAN FRANCISCO	CA	No		ASE
WPCJ893	SAN MARCOS	CA	No		ASE
WPCB993	SANTA ANA	CA	No		ASE



Attachment B  
Arch Communications Group, Inc.  
Authorized and Pending Sites Listed by State  
on Frequency 929.8375 as of October 14, 1993

State: CA

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCC234	SIGNAL HILL	CA	No		ASE
WPCE301	STOCKTON	CA	No		ASE
WPCY848	TRUCKEE	CA	No		ASE
WPCE301	VISALIA	CA	No		ASE
WPCC266	WALNUT GROVE	CA	No		ASE
WPCC266	WOODLAND	CA	No		ASE

Number of sites in state: 49

State: CO

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCB999	AURORA	CO	No		ASE
WPCJ705	BOULDER	CO	No		ASE
WPCB999	CASTLE ROCK	CO	No		ASE
WPCB999	COLORADO SPRINGS	CO	No		ASE
WPCB999	DENVER	CO	No		ASE
WPCB999	ENGLEWOOD	CO	No		ASE
WPCJ705	FORT COLLINS	CO	No		ASE
WPCJ705	GLENWOOD SPRINGS	CO	No		ASE
WPCB999	GOLDEN	CO	No		ASE
WPCJ705	MESA	CO	No		ASE
WPCJ705	VAIL	CO	No		ASE

Number of sites in state: 11

State: CT

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCS863	EAST HAMPTON	CT	No		ACV
WPBF658	FARMINGTON	CT	No		ACV
WPCS863	MERIDEN	CT	No		ACV
WPCS863	TOLLAND	CT	No		ACV

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Arch Communications Group, Inc.  
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State: CT

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCS863	TORRINGTON	CT	No		ACV
WPCS863	WEST HAVEN	CT	No		ACV
WPCS863	WOODSTOCK	CT	No		ACV

Number of sites in state: 7

State: DE

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCZ756	DOVER	DE	No		ASE
WPCZ756	GEORGETOWN	DE	No		ASE
WPCJ717	WILMINGTON	DE	No		ACD

Number of sites in state: 3

State: FL

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCZ757	ATLANTIC BEACH	FL	No		ASE
WPCZ757	BALDWIN	FL	No		ASE
WPBU638	BOCA RATON	FL	No		ASE
WPBU638	BOYNTON BEACH	FL	No		ASE
WPAR454	BRADENTON	FL	Yes		ASE
WPBG850	BROOKSVILLE	FL	Yes		ASE
WPCZ757	CALLAHAN	FL	No		ASE
WPAF300	CLERMONT	FL	Yes		ASE
WPAJ477	COCOA	FL	Yes		ASE
WPDH746	DADE CITY	FL	Yes		ASE
WPAR454	DELAND	FL	Yes		ASE
WPBG850	EDGEWATER	FL	Yes		ASE
WPBU638	FT. LAUDERDALE	FL	No		ASE
WPBU638	HIALEAH	FL	No		ASE
WPAJ477	HOLLY HILL	FL	Yes		ASE

Attachment B  
Arch Communications Group, Inc.  
Authorized and Pending Sites Listed by State  
on Frequency 929.8375 as of October 14, 1993

State: FL

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCZ757	JACKSONVILLE	FL	No		ASE
WPAF300	KISSIMMEE	FL	Yes		ASE
WPAF300	LAKE BUENA VISTA	FL	Yes		ASE
WPAJ477	LAKELAND	FL	Yes		ASE
WPDH746	LONGWOOD	FL	Yes		ASE
WPBU638	MIAMI	FL	No		ASE
WPCZ757	MIDDLEBURG	FL	No		ASE
WPAD804	OLDSMAR	FL	Yes		ASE
WPAF300	ORLANDO	FL	Yes		ASE
WPAJ477	ORLANDO	FL	Yes		ASE
WPAJ477	PALM BAY	FL	Yes		ASE
WPBS480	PENSACOLA	FL	No		ASE
WPAF300	PORT RICHEY	FL	Yes		ASE
WPAR454	SARASOTA	FL	Yes		ASE
WPAD804	SEMINOLE	FL	Yes		ASE
WPCZ757	SWITZERLAND	FL	No		ASE
WPAJ477	TAMPA	FL	Yes		ASE
WPBG850	TITUSVILLE	FL	Yes		ASE
WPAD804	VENICE	FL	Yes		ASE
WPBU638	WEST PALM BEACH	FL	No		ASE

Number of sites in state: 35

State: GA

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPDD851	ACREE	GA	No		ASE
WPCZ755	ATHENS	GA	No		ASE
WPCZ755	ATLANTA	GA	No		ASE
WPDD851	EASTMAN	GA	No		ASE
WPCZ755	FAIRBURN	GA	No		ASE
WPBU637	HARLEM	GA	Yes		ASE
WPDD851	HIGGSTON	GA	No		ASE
WPDD851	JONESBORO	GA	No		ASE
WPDD851	MACON	GA	No		ASE
WPCZ755	MARIETTA	GA	No		ASE
WPCZ755	ROSWELL	GA	No		ASE

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Arch Communications Group, Inc.  
Authorized and Pending Sites Listed by State  
on Frequency 929.8375 as of October 14, 1993

State: GA

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCZ755	STONE MOUNTAIN	GA	No		ASE
WPDD851	VALDOSTA	GA	No		ASE
WPBU637	WAYNESBORO	GA	Yes		ASE

Number of sites in state: 14

State: HI

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCQ269	EWA DISTRICT	HI	No		ASE
WPCQ269	HONOLULU	HI	No		ASE
WPCQ269	HONOLULU	HI	No		ASE
WPCQ269	KANEOHE	HI	No		ASE
WPCQ269	NANAKULI	HI	No		ASE
WPCQ269	WAHIAWA DISTRICT	HI	No		ASE

Number of sites in state: 6

State: IA

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCQ884	CEDAR RAPIDS	IA	No		ASE
WPCQ884	DENISON	IA	No		ASE
WPCQ884	DES MOINES	IA	No		ASE
WPCQ884	JEFFERSON	IA	No		ASE
WPCQ884	MARSHALLTOWN	IA	No		ASE
WPCQ884	OTTUMWA	IA	No		ASE

Number of sites in state: 6

Attachment B  
Arch Communications Group, Inc.  
Authorized and Pending Sites Listed by State  
on Frequency 929.8375 as of October 14, 1993

State: ID

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCQ894	AMERICAN FALLS	ID	No		ASE
WPCQ894	BOISE	ID	No		ASE
WPCQ894	GOODING	ID	No		ASE
WPCQ894	IDAHO FALLS	ID	No		ASE
WPCQ893	KELLOG	ID	No		ASE
WPCQ894	MOUNTAIN HOME	ID	No		ASE
WPCQ894	RUPERT	ID	No		ASE

Number of sites in state: 7

State: IN

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCZ734	GEORGETOWN	IN	No		ASE
WPBW278	GREENWOOD	IN	No		ASE
WPBW278	INDIANAPOLIS	IN	No		ASE
WPBW278	INDIANAPOLIS	IN	No		ASE
WPBW278	INDIANAPOLIS	IN	No		ASE
WPBW278	INDIANAPOLIS	IN	No		ASE
WPBW278	INDIANAPOLIS	IN	No		ASE

Number of sites in state: 7

State: KS

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCC237	LEAVENWORTH	KS	No		ASE
WPCC237	MERRIAM	KS	No		ASE

Number of sites in state: 2

Attachment B  
Arch Communications Group, Inc.  
Authorized and Pending Sites Listed by State  
on Frequency 929.8375 as of October 14, 1993

State: KY

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCR473	CAMPBELLSVILLE	KY	No		ASE
WPCZ734	CARROLLTON	KY	No		ASE
WPCZ734	CRESTWOOD	KY	No		ASE
WPCR473	ELIZABETHTOWN	KY	No		ASE
WPCZ734	FAIRDALE	KY	No		ASE
WPCR473	LEXINGTON	KY	No		ASE
WPCR473	LOUISVILLE	KY	No		ASE
WPCZ734	NEW CASTLE	KY	No		ASE
WPCZ734	SHELBYVILLE	KY	No		ASE
WPCR473	STANTON	KY	No		ASE
WPCR473	WILLIAMSTOWN	KY	No		ASE

Number of sites in state: 11

State: LA

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPBS509	BATON ROUGE	LA	No		ASE
WPBW297	BERWICK	LA	No		ASE
WPBP230	BOHEMIA	LA	No		ASE
WPBP230	COVINGTON	LA	No		ASE
WPBS509	DONALDSONVILLE	LA	No		ASE
WPBW279	EDGERLY	LA	No		ASE
WPBS509	FRISCO	LA	No		ASE
WPBS508	GARYVILLE	LA	No		ASE
WPBS508	GRETNA	LA	No		ASE
WPBS509	HAMMOND	LA	No		ASE
WPBW297	HOUMA	LA	No		ASE
WPBS509	JACKSON	LA	No		ASE
WPBS508	KENNER	LA	No		ASE
WPBW297	LAFAYETTE	LA	No		ASE
WPBW297	LAROSE	LA	No		ASE
WPBP230	LEEVILLE	LA	No		ASE
WPBW279	MERMENTAU	LA	No		ASE
WPBS508	METAIRIE	LA	No		ASE
WPBP230	NEW ORLEANS	LA	No		ASE
WPBS508	NEW ORLEANS	LA	No		ASE

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State: LA

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPBS508	NEW ORLEANS	LA	No		ASE
WPBP230	ST. TAMMANY	LA	No		ASE
WPBW297	THIBODAUX	LA	No		ASE
WPBW279	VENICE	LA	No		ASE
WPBS509	WALKER	LA	No		ASE

Number of sites in state: 25

State: MA

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPBF658	HOLYOKE	MA	No		ACV
WPBF658	PITTSFIELD	MA	No		ACV

Number of sites in state: 2

State: MD

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCZ756	DENTON	MD	No		ASE
WPCZ756	POCOMOKE CITY	MD	No		ASE
WPCZ756	SALIBURY	MD	No		ASE

Number of sites in state: 3

State: ME

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPBB442	AUGUSTA	ME	No		ACV

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State: ME

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPBB442	FALMOUTH	ME	No		ACV
WPBB442	HOLDEN	ME	No		ACV
WPBB442	ROCKLAND	ME	No		ACV
WPBB442	YORK	ME	No		ACV

Number of sites in state: 5

State: MN

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCJ718	CHISAGO	MN	No		ASE
WPCJ718	HASTINGS	MN	No		ASE
WPCJ718	LINO LAKES	MN	No		ASE
WPCJ718	MAPLE PLAIN	MN	No		ASE
WPCJ718	MINNEAPOLIS	MN	No		ASE
WPCJ718	SAINT PAUL	MN	No		ASE

Number of sites in state: 6

State: MO

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPBS536	BERKELET	MO	No		ASE
WPBS536	BRENTWOOD	MO	No		ASE
WPBS536	CREVE COEUR	MO	No		ASE
WPCQ886	HANNIBAL	MO	No		ASE
WPCC237	INDEPENDENCE	MO	No		ASE
WPCQ886	JEFFERSON CITY	MO	No		ASE
WPCQ886	JONESBURG	MO	No		ASE
WPCC237	KANSAS CITY	MO	No		ASE
WPCC237	KANSAS CITY	MO	No		ASE
WPCQ886	KIRKSVILLE	MO	No		ASE
WPCQ886	LEBANON	MO	No		ASE



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State: MO

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCC237	LIBERTY	MO	No		ASE
WPBS536	SHREWBURY	MO	No		ASE
WPCQ886	SPRINGFIELD	MO	No		ASE
WPBS536	ST. CHARLES	MO	No		ASE
WPBS536	ST. LOUIS	MO	No		ASE

Number of sites in state: 16

State: MS

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPBP230	PICAYUNE	MS	No		ASE

Number of sites in state: 1

State: MT

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPCQ893	HELENA	MT	No		ASE
WPCQ893	MISSOULA	MT	No		ASE
WPCQ893	PHILIPSBURG	MT	No		ASE
WPCQ893	SUPERIOR	MT	No		ASE

Number of sites in state: 4

State: NC

Callsign/ File #	Site Name		Oper- ational?	Add'l Frequency (Note 1)	Licensee (Note 2)
WPAZ626	ALBEMARLE	NC	Yes		ASE